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August 23, 2013

Technical Director
Financial Accounting Standards Board
401 Merritt 7, PO Box 5116
Norwalk, CT 06856

Re: Business Combinations (Topic 805) – Accounting for Identifiable Intangible Assets File Reference No. PCC – 13 – 01A

To Whom It May Concern:

The Georgia Credit Union League (GCUL) appreciates the opportunity to comment on the proposal on accounting for a business combination. As a matter of background, GCUL is the state trade association and one member of the network of state leagues that make up the Credit Union National Association (CUNA). GCUL serves approximately 139 Georgia credit unions that have over 1.9 million members. This letter reflects the views of our Regulatory Response Committee, which has been appointed by the GCUL Board to provide input into proposed regulations such as this.

GCUL supports the Financial Accounting Standards Board's (FASB), and Private Company Council's (PCC) efforts to simplify reporting for private entities. While we generally support the scope of the proposal, we would like to remind FASB and PCC of the unique structure of credit unions.

Credit unions are member-owned, not-for-profit financial cooperatives that operate for the purpose of promoting thrift, providing credit, and other financial services at competitive rates. Credit unions goals are to help people afford life. Credit unions are also different in that, the Federal Credit Union Act limits net worth to retained earnings only. This statutory limitation restricts the ability of the NCUA to adjust its regulations in response to changes in accounting standards, as is possible for other federal financial regulators. For credit unions the financial statement users are very different from those of a bank, including both public and private.

We believe the types of entities noted in the proposal are appropriate, as are the transactions and accounts, which are referenced. We would not oppose the expansion of the proposal to other entities, such as those falling within the FASB's definitions of "publicly traded company" and "not-for-profit entity."

The proposed amendments would provide guidance about an accounting alternative for the recognition, measurement, and disclosure of identifiable intangible assets acquired in a business combination. Identifiable intangible assets that arise from contractual rights would be measured using the fair value measurement principles of Topic 820 except that the measurement only would consider market participant assumptions about the remaining noncancelable term, and, therefore would not consider any potential contractual renewals or cancellations that ordinarily would be considered in determining the fair value of that contract. We believe the amendments to this proposal would likely reduce costs and complexity by providing an entity with an accounting alternative to recognize only those identifiable intangible assets arising from noncancelable contractual terms or those arising from other legal rights.

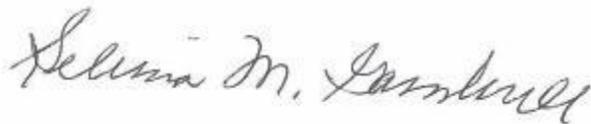
We also agree that the proposed amendments generally would result in entities recognizing fewer intangible assets in a business combination than under current GAAP because not all identifiable intangible assets would be recognized separately, as is currently required.

We believe the alternative recognitions, measurement, and disclosure guidance would continue to provide decision-useful information to the users of private company financial statements, while reducing the cost and complexity associated with the valuation of certain identifiable intangible assets.

Although the proposal does not include an effective date, we would like to see it effective as soon as practical, particularly since application is at the discretion of the reporting entity. We also believe that early application of the alternative should be permitted.

GCUL appreciates the opportunity to present comments on behalf of Georgia's credit unions. Thank you for your consideration. If you have questions about our comments, please contact Selina Gambrell or Cindy Connelly at (770) 476-9625.

Respectfully submitted,

A handwritten signature in cursive script that reads "Selina M. Gambrell".

Selina M. Gambrell
Compliance Specialist